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November 21, 2018

VIA ECF & U.S. MAIL

The Honorable William H. Pauley, III
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: United States v. Cohen, 18-cr-602 – Request to Unseal Materials

Dear Judge Pauley:

This firm represents CBS Broadcasting Inc., on behalf of CBS News. We write to join in the applications of American Broadcasting Companies, Inc., the Associated Press, Cable News Network, Inc., Daily News, L.P., Dow Jones & Co., Inc., Newsday LLC, and NYP Holdings, Inc. (Doc. Nos. 12 & 17), and The New York Times Company (Doc. Nos. 9 & 15), requesting that the Court unseal certain search warrant materials related to Michael Cohen.

CBS wholeheartedly agrees with the other news organizations that the public interest in obtaining access to these judicial documents is great. Accordingly, CBS joins the pending requests that the Court weigh carefully the Government's assertions about the nature of its investigation of other targets and its purported need for continued blanket secrecy against the extreme public importance of these materials, utilizing well-established First Amendment and common law principles. Further, CBS respectfully joins in the requests that the Court make every effort to make these materials available to the public – even in redacted form – at the earliest possible time.

Thank you for your attention to this matter.

Respectfully submitted,

Davis Wright Tremaine LLP

A handwritten signature in cursive script, appearing to read 'Rachel', written over the printed name of Rachel Strom.

Rachel Strom
Jeremy Chase

cc: Attorneys of Record (via ECF)

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